

**a. IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

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In re:	:	Chapter 11
	:	
CIRCUIT CITY STORES, INC., <u>et al.</u> ,	:	Case No. 08-35653-KRH
	:	
Debtors.	:	Jointly Administered
	:	Judge Kevin R. Huennekens
-----	x:	

MOTION FOR ADMISSION OF FRANK G. BURT *PRO HAC VICE*

J.R. Smith (the “Movant”), a member in good standing of the Bar of the State of Virginia, an attorney admitted to practice before the United States Bankruptcy Court of the Eastern District of Virginia, and an attorney with the Richmond, Virginia office of the law firm of Hunton & Williams LLP, hereby moves (the “Motion”) the Court to enter an Order permitting Frank G. Burt, an attorney with the Washington, DC office of the law firm of Jorden Burt LLP (the “Admittee”), to practice *pro hac vice* before the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division, to represent American Bankers Insurance Company of Florida, Federal Warranty Service Corporation, Sureway, Inc., United Service Protection, Inc. and Assurant, Inc., pursuant to Rule 2090-1(E)(2) of the Local Rules of the Bankruptcy Court of the Eastern District of Virginia (the “Local Rules”) in the above-captioned proceeding. In support of the Motion, the Movant states as follows:

J.R. Smith [VSB No. 41913]
HUNTON & WILLIAMS LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219-4074
Telephone: (804) 788-8200
Facsimile: (804) 788-8218

*Counsel for American Bankers
Insurance Company of Florida,
Federal Warranty Service
Corporation, Sureway, Inc.,
United Service Protection, Inc.
and Assurant, Inc.*

Raul A. Cuervo [DCB No. 463718]
JORDEN BURT LLP
1025 Thomas Jefferson St., N.W.
Suite 400 East
Washington, DC 20007
Telephone: (202) 965-8100
Facsimile: (202) 965-8104

1. The Admittee is a member in good standing of the Bar of the State of Florida and the District of Columbia. The Admittee is admitted to practice before the United States District Court for the Southern and Middle Districts of Florida, the Southern and Northern Districts of Illinois, the Eastern District of Wisconsin, and the District of Columbia and the United States Circuit Court of Appeals for the Fourth, Fifth, Seventh, Eighth, and Eleventh Circuits, the United States Tax Court, and the United States Supreme Court. There are no disciplinary proceedings pending against the Admittee. The Admittee understands that if he is admitted *pro hac vice*, he will be subject to the disciplinary jurisdiction of this Court.

2. Movant requests that the Court allow the Motion so that the Admittee may file pleadings and appear and be heard at hearings in this chapter 11 case in accordance with the requirements of Local Rule 2090-1(E)(2).

3. The Movant respectfully requests that this Court treat this Motion as a written memorandum of points and authorities or waive any requirement that this Motion be accompanied by a written memorandum of points and authorities as described in Local Rule 9013-1(G).

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4. Notice of this Motion has been provided to the Office of the United States Trustee for the Eastern District of Virginia, Richmond Division, counsel to the above-captioned debtors, and counsel to the creditor's committee. Due to the administrative nature of the relief requested herein, Movant submits that no other or further notice need be given.

Dated: January 26, 2009
Richmond, Virginia

/s/ J.R. Smith
J.R. Smith [VSB # 41913]
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Counsel for American Bankers Insurance
Company of Florida, Federal Warranty Service
Corporation, Sureway, Inc., United Service
Protection, Inc. and Assurant, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on January 26, 2009, a true and complete copy of the foregoing was filed and served electronically using the Court's ECF System and was sent by first class mail, postage prepaid, to the entities at the addresses indicated below:

McGuireWoods LLP
World Trade Center
101 West Main Street, Suite 9000
Norfolk, VA 23510-1655
Attn: Douglas M. Foley, Esq.

McGuireWoods LLP
One James Center
901 East Cary Street
Richmond, Virginia 23219
Attn: Dion W. Hayes, Esq.

Skadden Arps, Slate Meagher & Flom LLP
One Rodney Square
Box 636
Wilmington, Delaware 19899
Attn: Gregg Galardi, Esq.

Attorneys for Circuit City Stores, Inc.

Office of the United States Trustee
701 E. Broad Street, Suite 4304
Richmond, VA 23219
Attn: Robert B. Van Arsdale, Esq.

Jeffrey N. Pomerantz, Esq.
Pachulski Stang Ziehl & Jones LLP
10100 Santa Monica Boulevard, 11th Floor
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Lynn L. Tavenner, Esq.
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20 North Eighth Street, Second Floor
Richmond, VA 23219

Counsel to the Creditor's Committee

/s/ J.R. Smith

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
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In re:	:	Chapter 11
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CIRCUIT CITY STORES, INC., <u>et al.</u> ,	:	Case No. 08-35653-KRH
	:	
Debtors.	:	Jointly Administered
	:	Judge Kevin R. Huennekens
-----	x:	

ORDER GRANTING ADMISSION OF FRANK G. BURT *PRO HAC VICE*

This matter comes before the Court on the Motion for Admission of Frank G. Burt *Pro Hac Vice* (the "Motion"), filed by J.R. Smith of Hunton & Williams LLP. The Court, having jurisdiction to consider the Motion, finding that due and sufficient notice having been given, and sufficient cause appearing, hereby ORDERS that:

1. The Motion is **GRANTED**.

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2. Frank G. Burt is permitted to appear *pro hac vice* in the above-captioned proceeding, in accordance with Rule 2090-1(E)(2) of the Local Rules of the Bankruptcy Court of the Eastern District of Virginia.

ENTERED in Richmond, Virginia this _____ day of _____, 2009.

United States Bankruptcy Judge

WE ASK FOR THIS:

/s/ J.R. Smith
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Company of Florida, Federal Warranty
Service Corporation, Sureway, Inc., United
Service Protection, Inc., and Assurant, Inc.*

LOCAL RULE 9022-1(C)(1) CERTIFICATION

I hereby certify that the foregoing has been either endorsed by or served upon all necessary parties, via the Court's CM/ECF system and the following parties via US regular mail, on this 26th day of January, 2009.

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Counsel to the Creditor's Committee

/s/ J.R. Smith